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September 8, 1998

BY HAND DELIVERY

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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SEP 8 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

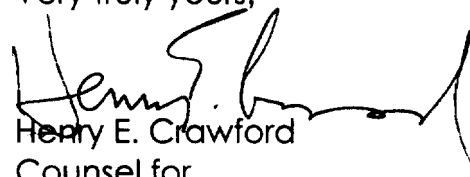
Re: In the Matter of
Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
Lufkin, Texas
MM Docket No. 98-125; RM-9301

Dear Ms. Salas:

Transmitted herewith on behalf of Grapeland Broadcasting Company are an original and four (4) copies of its "Comments and Counterproposal" as directed to the Allocations Branch.

Should any additional information be required, please contact this office.

Very truly yours,


Henry E. Crawford
Counsel for
Grapeland Broadcasting
Company

cc: The Allocations Branch

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LRL/ABC/DE

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)	MM Docket No. 98-125
)	
Amendment of Section 73.202(b))	RM-9301
Table of Allotments)	
FM Broadcast Stations)	
Lufkin, Texas)	

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To: The Allocations Branch
Policy and Rules Division
Mass Media Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS AND COUNTERPROPOSAL

Grapeland Broadcasting Company ("Grapeland"), by counsel, hereby submits its *Comments and Counterproposal* in connection with the above-captioned rulemaking proceeding. Grapeland's counterproposal seeks to amend the FM Table of Allotments, Section 73.202 of the Commission's Rules, to assign FM Channel 232C2 to the community of Grapeland, Texas, as follows:

Grapeland, Texas	--	232C2
Cameron, Texas	232A	286A

1. As indicated in the attached engineering exhibits, Channel 232C2 can be assigned to Grapeland in complete compliance with the Commission's distance separation requirements as contained in 47 CFR §73.207. The short spacing to KVJM, at Hearne, Texas referred to in the channel study (attached hereto as Exhibit 1) does not reflect the fact that KVJM has been reallocated to Ch. 276. Additionally, the reference to KLDE at Houston, Texas is merely its

auxiliary transmitter site. Therefore, adding 232C2 at Grapeland, Texas is in full compliance with the Commission's Rules.

2. Presently, there are two applicants for Ch. 232A at Cameron, Texas: Roy E Henderson d/b/a Cameron Broadcasting Company (BPH-961118M8) and Radio Sun Group of Texas, Inc. (BPH-961118MO). Both applicants are in accord with a change of the channel from Ch. 232A to 286A. Using the reference coordinates specified in the application of Roy E. Henderson d/b/a Cameron Broadcasting Company,¹ the move from Ch. 232A to 286A can be seen as conforming entirely with the Commission's Rules (see channel study, attached hereto as Exhibit 2). In accordance with Commission policy, Grapeland promises to reimburse either one or both applicants for whatever costs may be associated with the channel change.

3. The reference coordinates proposed by Grapeland: N 31-22-08, W 95-16-02 will project a 70dbu city grade contour entirely encompassing the city of Grapeland, Texas.

4. Grapeland is a city located in Houston county, Texas. According to the 1990 Census, Grapeland has a population of 1,450 persons. At present, the community is not receiving community service from any aural service. Therefore, the public interest will be served by the assignment of Channel 232C2 to Grapeland, Texas.

¹ At present both applicants has executed and filed a timely settlement agreement in accordance with the Commission's pre-February 1, 1998 settlement rules. That matter is pending before the Commission.

5. If the Commission assigns Channel 232C2 to Grapeland, Texas, Grapeland will apply for a construction permit and will construct a new facility upon award of that permit.

6. Therefore, Grapeland requests the following changes to the Commission's FM Table of Alotments:

Grapeland, Texas	--	232C2
Cameron, Texas	232A	286A


WHEREFORE, in accordance with the above, Grapeland Broadcasting Company respectfully requests that Channel 232C2 be assigned to Grapeland, Texas.

September 8, 1998

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Company
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Respectfully Submitted,

Grapeland Broadcasting

By: 
Henry E. Crawford
Its Attorney

Grapeland Broadcasting Company
Comments and Counterproposal
September 8, 1998

EXHIBIT 1

Grapeland TX
Grapeland Broadcasting Company
Proposed 232C2 @ Grapeland Texas

REFERENCE
31 22 08 N
95 16 02 W

CLASS = C2
Current Spacings

DISPLAY DATES
DATA 09-08-98
SEARCH 09-08-98

----- Channel 232 - 94.3 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
KVJM	LI 232A	Hearne	TX	136.67	245.4	166.0	-29.33	
KLDE	LI 233C	Houston	TX	178.74	183.1	188.0	-9.26	
ALOPEN	AL 232A	Cameron	TX	162.64	253.8	166.0	-3.36	
AD230	AD 230A	Lufkin	TX	51.65	92.6	55.0	-3.35	
KRUF	LI 233C	Shreveport	LA	191.60	40.6	188.0	3.60	
AP232	AP 232A	Cameron	TX	175.26	251.5	166.0	9.26	
AP232	AP 232A	Cameron	TX	177.40	251.8	166.0	11.40	
KLDE	LI 233C	Houston	TX	200.10	186.7	188.0	12.10	
KLTY.A	AP 231C	Fort Worth	TX	206.89	309.7	188.0	18.89	
KLTY	LI 231C	Fort Worth	TX	210.24	310.7	188.0	22.24	
KYKS	LI 286C	Lufkin	TX	59.12	89.8	35.0	24.12	
KQKYFM	LI 231C1	Beaumont	TX	184.48	138.7	158.0	26.48	
KVLLFM	LI 234C2	Woodville	TX	91.46	115.8	58.0	33.46	
KULF.C	CP 231C3	Brenham	TX	174.97	219.1	117.0	57.97	
KULF	LI 231A	Brenham	TX	174.97	219.1	106.0	68.97	

Grapeland Broadcasting Company
Comments and Counterproposal
September 8, 1998

EXHIBIT 2

Cameron Texas

Proposed 286A @ Cameron TX

REFERENCE
30 51 30 N
97 01 47 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 09-08-98
SEARCH 09-08-98

----- Channel 232 - 94.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
AP232	AP 232A	Cameron	TX	0.00	0.0	115.0	-115.00
AP232	AP 232A	Cameron	TX	2.28	90.8	115.0	-112.72
ALOPEN	AL 232A	Cameron	TX	15.89	50.1	115.0	-99.11
KVJM	LI 232A	Hearne	TX	44.19	90.8	115.0	-70.81
KAMX	LI 234C	Luling	TX	94.72	231.3	95.0	-0.28
KLBJFM	LI 229C	Austin	TX	95.12	230.3	95.0	0.12
KBCT.C	CPM 233A	Waco	TX	73.28	349.8	72.0	1.28
KULF.C	CP 231C3	Brenham	TX	98.85	143.4	89.0	9.85
KLTY.A	AP 231C	Fort Worth	TX	187.17	1.8	165.0	22.17
KULF	LI 231A	Brenham	TX	98.85	143.4	72.0	26.85
KLTY	LI 231C	Fort Worth	TX	192.03	1.7	165.0	27.03
KOKZ.A	AP 232C2	Comanche	TX	197.13	307.0	166.0	31.13
KLDE	LI 233C	Houston	TX	201.04	127.0	165.0	36.04
KLDE	LI 233C	Houston	TX	203.99	133.9	165.0	38.99
KOKZ.C	CP 232C2	Comanche	TX	209.88	306.2	166.0	43.88
KRVL	LI 232C2	Kerrville	TX	212.75	252.0	166.0	46.75

CERTIFICATE OF SERVICE

I, Henry E. Crawford, do hereby certify that copies of the foregoing
Comments and Counterproposal have been served by United States mail,
postage prepaid this 8th day of September, 1998 upon the following:

*Kathleen Scheuerle
Allocations Branch, Mass Media Bureau
Federal Communications Commission
2000 M Street, N.W., 5th Floor
Washington, D.C. 20554

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